

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs – Judgment Creditors,

v.

C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.,

Defendants – Judgment Debtors.

**PLAINTIFFS-JUDGMENT CREDITORS’
MOTION TO PRECLUDE, TO COMPEL AND FOR RELATED RELIEF**

For the reasons set forth in the attached Memorandum, Plaintiffs-Judgment Creditors (“Ungars”) respectfully move for an Order:

(1) Precluding Defendants from asserting in support of their Motion to Vacate that the judgment in this case has foreign policy implications and/or that the denial of their Motion to Vacate will have foreign policy implications, and precluding Defendants from introducing any evidence or testimony in putative support of any such assertion;

(2) (a) Compelling Defendants to produce Salam Fayyad at a deposition to provide testimony and answer questions concerning:

(i) Any assistance he received in preparing the declaration signed by him dated December 24, 2007 (including any assistance he received in preparing the letter dated June 18, 2005 that was attached to his declaration) (collectively hereinafter: “Fayyad Declaration”) that was submitted by Defendants in support of their Motion to Vacate; and

(ii) Mr. Fayyad's own understanding of the positions he took and the statements he made in the Fayyad Declaration.

(b) Compelling Defendants to produce Mr. Fayyad for the deposition referred to *supra* within two weeks, either:

(i) In Providence, Rhode Island; or,

(ii) in East Jerusalem, at Defendants' election, provided that if Defendants choose to hold the deposition in East Jerusalem they shall bear the attorneys fees and costs incurred by the Ungars as a result of holding the deposition in East Jerusalem rather than in Providence; and

(3) Granting such other relief as the Court finds just, necessary or appropriate.

Dated: September 1, 2010

Plaintiffs-Judgment Creditors,
by their Attorneys,

/s/ Max Wistow

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RULE 37 CERTIFICATE

I HEREBY CERTIFY that I made a good faith effort to resolve the within discovery dispute with opposing counsel during the course of Mr. Fayyad's deposition in Israel, both on and off the record, prior to the commencement of this motion practice.

/s/ Max Wistow
Max Wistow #0330

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on September 1, 2010, a true and genuine copy of the foregoing was sent by electronic mail to Defendants' counsel of record listed below:

Deming E. Sherman
Edwards Angell Palmer & Dodge LLP
2800 Bank Boston Plaza
Providence, RI 02903

Richard A. Hibey
Mark J. Rochon
Brian Hill
Miller & Chevalier Chartered.
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Washington, DC 20005-5701

/s/ Max Wistow

I HEREBY FURTHER CERTIFY that, on September 1, 2010, a true and genuine copy of the foregoing was hand delivered to Defendants' counsel of record listed below:

Deming E. Sherman
Edwards Angell Palmer & Dodge LLP
2800 Bank Boston Plaza
Providence, RI 02903

/s/ Max Wistow